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Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AWS, LLC, a Nevada limited liability company;  
ADAMS CONSULTING, LLC, a California limited  
liability company; FBA DISTRIBUTORS, LLC, a  
Massachusetts limited liability company; FBA  
STORES, LLC, a Nevada limited liability company;  
GLOBAL MARKETING SERVICES L.L.C., a  
Nevada limited liability company; INFO PROS,  
LLC, a Nevada limited liability company; INFO  
SOLUTIONS, LLC, a Nevada limited liability  
company; ONLINE AUCTION LEARNING  
CENTER, INC., a Massachusetts corporation;  
ONLINE AUCTION LEARNING CENTER, INC.,  
a Nevada corporation; CHRISTOPHER F.  
BOWSER; ADAM S. BOWSER; JODY L.  
MARSHALL; and JEFFREY A. GOMEZ,

Defendants.

CASE NO. 2:18-cv-00442-JCM-PAL

**STIPULATION AND ORDER  
EXTENDING THE DURATION OF  
THE TEMPORARY  
RESTRAINING ORDERS AND  
SETTING PRELIMINARY  
INJUNCTION HEARING AS TO  
DEFENDANTS ADAMS  
CONSULTING, LLC, GLOBAL  
MARKETING SERVICES L.L.C.,  
AND JEFFREY A. GOMEZ**

1 This matter comes before the Court upon the stipulation of all the parties, including  
2 plaintiff Federal Trade Commission (“FTC”), and defendants AWS, LLC, Adams Consulting,  
3 LLC, FBA Distributors, LLC, FBA Stores, LLC, Global Marketing Services L.L.C., Info Pros,  
4 LLC, Info Solutions, LLC, Online Auction Learning Center, Inc. (Mass. Corp.), Online Auction  
5 Learning Center, Inc. (Nev. Corp.), Christopher F. Bowser, Adam S. Bowser, Jody Marshall, and  
6 Jeffrey A. Gomez (collectively “Defendants”), for: (i) further extension of the Temporary  
7 Restraining Order issued at 1:30 p.m. on March 14, 2018 [ECF No. 29] (“Original TRO”)   
8 against defendants AWS, LLC, FBA Distributors, LLC, FBA Stores, LLC, Info Pros, LLC, Info  
9 Solutions, LLC,<sup>1</sup> Online Auction Learning Center, Inc. (Mass. Corp.), Online Auction Learning  
10 Center, Inc. (Nev. Corp.), Christopher F. Bowser, Adam S. Bowser, and Jody Marshall  
11 (collectively “Bowser Defendants”); (ii) extension of the Stipulated Temporary Restraining  
12 Order issued on April 18, 2018 [ECF No. 57] (“Gomez Stipulated TRO”) against defendants  
13 Adams Consulting, LLC, Global Marketing Services L.L.C., and Jeffrey A. Gomez (collectively  
14 “Gomez Defendants”); (iii) vacating the evidentiary hearing on the FTC’s motion for preliminary  
15 injunction as to the Bowser Defendants; and (iv) extending the briefing schedule and setting an  
16 evidentiary hearing on the FTC’s motion for a preliminary injunction as to the Gomez  
17 Defendants. The FTC and Defendants, each of which is represented by counsel for purposes of  
18 this stipulation, **HEREBY STIPULATE TO THE FOLLOWING:**

19 1. The duration of the Original TRO [ECF No. 29] is extended and shall remain in  
20 place by consent of the Bowser Defendants until the Court issues a ruling on the FTC’s request  
21 for a preliminary injunction, or further order of the Court. Unless otherwise ordered, all

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22 <sup>1</sup> Info Solutions, LLC (“Info Solutions”) was not named in the original Complaint and was not explicitly referenced  
23 in the Original TRO. However, the FTC contends that Info Solutions is covered by the Original TRO as a Corporate  
Defendant in that it was an affiliate of the corporate defendants named in the original Complaint. Additionally, the  
Receiver has designated Info Solutions a Receivership Entity under the Original TRO and, as such, its assets are  
frozen and form part of the receivership estate.

1 provisions of the Original TRO shall remain in place during the extension, including the asset  
2 freeze and appointment of the receiver Robb Evans & Associates LLC. Defendants specifically  
3 reserve all rights and nothing herein shall be construed as an admission of any kind or impair  
4 Defendants' right to assert any and all defenses they may have. The reason for the extension of  
5 the Original TRO is to allow the FTC to review and, if appropriate, approve a stipulated final  
6 order for permanent injunction and monetary relief as to the Bowser Defendants ("Bowser  
7 Stipulated Final Order"). FTC counsel are submitting the Bowser Stipulated Final Order to the  
8 FTC for review and approval, and are informed that the approval process could take up to eight  
9 weeks. If the FTC approves the Bowser Stipulated Final Order, it will be filed for approval by  
10 the Court. If approved by the FTC and the Court, the Bowser Stipulated Final Order will resolve  
11 all disputes between the FTC and the Bowser Defendants.

12         2.       The evidentiary hearing on Plaintiff Federal Trade Commission's motion for  
13 preliminary injunction set for May 17, 2018 [ECF No. 60] is vacated and re-scheduled as set  
14 forth below only as to the Gomez Defendants. All deadlines for motions, memoranda, proposed  
15 orders, pleadings, responses or oppositions, and affidavits concerning the FTC's motion for  
16 preliminary injunction as to the Bowser Defendants set forth in the Second Stipulation and Order  
17 Extending the Duration of the Temporary Restraining and Postponing Preliminary Injunction  
18 Hearing [ECF No. 49] are vacated until further order of the Court.

19         3.       The duration of the Gomez Stipulated TRO [ECF No. 57] is extended and shall  
20 remain in place by consent of the Gomez Defendants until the Court issues a ruling on the FTC's  
21 request for a preliminary injunction as to the Gomez Defendants, or further order of the Court.  
22 Unless otherwise ordered, all provisions of the Gomez Stipulated TRO shall remain in place  
23 during the extension, including the asset freeze and appointment of the receiver Robb Evans &

1 Associates LLC. The Gomez Defendants specifically reserve all rights and nothing herein shall  
2 be construed as an admission of any kind or impair Gomez Defendants' right to assert any and  
3 all defenses they may have. The reason for the extension of the Gomez Stipulated TRO is to  
4 allow the Gomez Defendants and the FTC additional time to conduct compromise negotiations,  
5 and, if necessary, additional time to prepare for the preliminary injunction hearing on the FTC's  
6 request for a preliminary injunction as to the Gomez Defendants.

7 4. All the deadlines for motions, memoranda, proposed orders, pleadings, responses  
8 or oppositions, and affidavits concerning the FTC's request for preliminary injunction as to the  
9 Gomez Defendants set forth in Gomez Stipulated TRO issued on April 18, 2018 [ECF No. 57]  
10 are vacated and re-set as follows:

11 a. The FTC shall file with the Court, and serve on counsel for the Gomez  
12 Defendants, its memorandum of law in support of its motion for preliminary injunction  
13 and a proposed preliminary injunction order as to the Gomez Defendants no later than  
14 **Friday, May 11, 2018.**

15 b. The Gomez Defendants shall file with the Court, and serve on  
16 Commission counsel, any pleadings concerning preliminary injunction, including  
17 responses or oppositions, affidavits, motions, expert reports or declarations, or legal  
18 memoranda no later than **Friday, May 25, 2018.**

19 c. The FTC may file with the Court, and serve on counsel for the Gomez  
20 Defendants, its reply no later than **Friday, June 1, 2018.**

5. The evidentiary hearing on Plaintiff Federal Trade Commission's motion for preliminary injunction as to the Gomez Defendants is set for **June 5, 2018 at 10:00 a.m.**, at the **United States Courthouse, 333 S. Las Vegas Blvd., Las Vegas, NV 89101** in **Courtroom 6A**.

**IT IS SO ORDERED:**

*James C. Mahan*  
HONORABLE JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE

DATED: April 27, 2018

## IT IS SO STIPULATED:

/s/ Ronald D. Green

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/s/ Roberto Anguizola

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**Court Appointed Receiver**

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